

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	NO. 1:17cv2989
BRIAN P. KEMP, et al.)	
)	
<u>Defendants.</u>)	

**[PROPOSED] ORDER GRANTING PLAINTIFFS’ EXPEDITED
MOTION FOR LIMITED EARLY AND EXPEDITED DISCOVERY**

The Court, having considered the procedural history, argument of counsel, and all relevant legal authority with respect to Plaintiffs’ Expedited Motion for Limited Early and Expedited Discovery (“Motion”), it is hereby

ORDERED that Plaintiffs’ Motion is GRANTED; and

ORDERED that Defendants Brian P. Kemp, the State Election Board, Merle King, the Fulton County Board of Registration and Elections, the Cobb County Board of Registration and Elections, and the DeKalb County Board of Registration and Elections produce the documents and electronically

stored information set forth in the applicable discovery requests attached to Plaintiffs' Motion as Exhibits A – F no later than August 23, 2017;

ORDERED that Defendant Merle King shall appear for a full-day deposition pursuant to Federal Rule of Civil Procedure 28 at a time to be agreed upon by the parties but in no event later than August 23, 2017; the deposition of Defendant King will be limited to the subject matter of Plaintiffs' Election Contest Claims and preliminary injunction motion, as filed, and will not limit Plaintiffs' ability to take a full deposition of Mr. King, if needed, in the ordinary course of discovery in this matter; and

ORDERED that Defendant Richard Barron shall appear for a full-day deposition pursuant to Federal Rule of Civil Procedure 28 at a time to be agreed upon by the parties but in no event later than August 23, 2017; the deposition of Defendant Barron will be limited to the subject matter of Plaintiffs' Election Contest Claims and preliminary injunction motion, as filed, and will not limit Plaintiffs' ability to take a full deposition of Mr. Barron, if needed, in the ordinary course of discovery in this matter.

ORDERED this ____ day of August 2017.

Judge Amy Totenberg

Proposed Order Submitted by:

/s/ Bryan Ward

Bryan Ward

Georgia Bar No. 736656

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/ Bryan Ward

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